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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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REGINO PEREZ, et. al.,	:	
	:	
Plaintiffs,	:	11 Civ. 08736-CM
	:	
vs.	:	
	:	AFFIRMATION
GRANNY SAYZ LLC, et. al.,	:	
	:	
	:	
Defendants.	:	
-----X		

VINCENT E. BAUER, under the penalty of perjury, states:

1. I am counsel to the remaining Defendant in this case, the Hon. Michael Grimm. I submit this Affirmation in support of the Congressman's application for an order extending from January 18, 2013 until March 13, 2013 the parties' time to submit a joint pre-trial order, other pre-trial submissions required by Your Honor's Individual Rules, and/or any motion for summary judgment in this case.
2. As the Court is aware, by letter dated November 20, 2012, Congressman Grimm made an application for an extension of the discovery deadline in this case, from December 7, 2012 until January 30, 2013. That application was granted.
3. Unfortunately, I neglected to request a corresponding extension of the deadline by which the parties are to file a joint pre-trial order, other pre-trial submissions required by Your Honor's rules, and any motion for summary judgment. I apologize for this oversight.

4. Congressman Grimm accordingly requests an order extending from January 18, 2013 until March 13, 2013 the parties' time to submit a joint pre-trial order, other pre-trial submissions required by Your Honor's Individual Rules, and/or any motion for summary judgment in this case. I thank the Court in advance for its attention to this issue. A proposed order is submitted herewith. Counsel has graciously agreed to this extension of time.

Dated: January 23, 2013

____s/_____